



**METROPOLITAN  
TRANSPORTATION  
COMMISSION**

Joseph P. Bort MetroCenter  
101 Eighth Street  
Oakland, CA 94607-4700  
Tel.: 510.464.7700  
TTY/TDD: 510.464.7769  
Fax: 510.464.7848  
e-mail: [info@mtc.ca.gov](mailto:info@mtc.ca.gov)  
Web site: [www.mtc.ca.gov](http://www.mtc.ca.gov)

April 12, 2001

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Deputy Director/Operations

**Therese W. McMillan**  
Deputy Director/Policy

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Opposition to the Petitions for Reconsideration of the Proceeding,  
"The Use of N11 Codes and Other Abbreviated Dialing Arrangements,"  
CC Docket 92-105**

Dear Ms. Salas:

The Metropolitan Transportation Commission (MTC) opposes recent petitions to the Federal Communications Commission (FCC) regarding its Third Report and Order on 511 and 211 abbreviated dialing codes, CC Docket 92-105 and strongly urges the FCC not to reconsider its decision regarding 511.

Nextel, Qwest, Sprint Spectrum, Verizon Wireless, and the Cellular Telecommunications & Internet Association (the wireless communications industry association) submitted petitions in opposition to the FCC's 511 order. SBC submitted a petition requesting clarification of the order. MTC wishes to address two points raised by the petitioners:

- Possible conflicts between government entities about 511 assignment
- Restriction of competition for provision of traveler information service

MTC serves as the transportation planning, funding, and coordinating agency for the nine-county San Francisco Bay Area. Since October 1996, MTC, with its project partners, the California State Department of Transportation and the California Highway Patrol, has provided real-time traveler information through a single telephone number (817-1717) to more than 3.2 million callers. We currently receive about 65,000 calls per month. During emergencies, such as the 1998 floods, the 817-1717 service has provided timely, specific information to as many as 10,000 callers a day.

MTC has entered into a six-year, \$38 million contract to improve our existing traveler information service (TravInfo®), including the traveler information telephone system. One critical improvement is to replace our existing telephone number with 511. MTC is working with the predominant carrier in our area, SBC/Pacific Bell, on the architecture of the 511 system in the Bay Area and we intend to launch 511 through its landline system as soon as a 511 product is available. We believe the companion 511 on wireless products will be equally as important.

**Issue 1: Possible Conflicts Between Government Entities About 511 Assignment**

Active coordination among government entities is essential to the success of 511 assignment. MTC and numerous other government agencies have been preparing for 511 deployment for over two years, when we submitted letters of support for the United States Department of Transportation petition to the FCC for a 3-digit number for traveler information. Since the FCC Third Report and Order was issued in July 2000, 511 coordination activities have intensified at the local, regional, state, and national levels.

Locally, MTC has been coordinating with agencies within and outside our nine-county jurisdiction to ensure that information is continuous and extends beyond county lines. Within the nine-county San Francisco Bay Area, MTC will provide 511 routing to a single point. There will not be multiple agencies to which 511 calls will be routed, as at least one of the petitioners alleged.

Similarly, at the state level, we are working with other involved agencies to ensure that there is a consistent strategy for 511 deployment throughout California. Finally, to facilitate national coordination, MTC has been actively involved in the American Association of State Highway and Transportation Officials (AASHTO) 511 Policy Committee and the AASHTO 511 Technical Working Group.

***Issue 2: Restriction of Competition For Provision of Traveler Information Service***

MTC's model for providing traveler information encourages strong private sector participation, especially for value-added services. While our telephone information service provides basic and accurate traveler information, MTC encourages third parties to use and enhance the traveler information data that we make available to provide personalized and value-added services. We believe that there is potential for carriers to offer such value-added services, as well. We will continue to work with carriers and other private-sector parties to create the largest market possible for traveler information.

MTC recognizes that continued cooperation and collaboration with wireless carriers is essential to the success of our traveler information program. Over the past several years, surveys<sup>1</sup> have shown that the number of users accessing our traffic information via cellular telephones has increased from 32% in 1997 to 47% in 1999. We expect that the share of cellular telephone callers has continued to increase since 1999, in line with the general growth of cellular telephone ownership. In recognition of the growing importance of wireless communications to the achievement of our objectives, MTC is working on building relationships with cellular carriers in our region. For the past few years, AT&T Wireless (formerly Cellular One) has provided direct access to our system through #817. We have contacted AT&T Wireless regarding our planned improvements and our intent to migrate to 511. In the past, we also made numerous contacts with GTE (now Verizon Wireless) and Nextel to propose a partnership. Although we have not succeeded in attracting their interest, we look forward to continuing to strengthen our existing relationship with AT&T Wireless and expanding collaborative efforts with other carriers in our region.

Most importantly, Bay Area travelers benefit from ready access to accurate, reliable traveler information. Survey results<sup>2</sup> indicate that over 55% of our current callers change their trip plans (e.g., different departure time, route, mode) based on information they hear through the phone system. We can expect this practical use of traveler information to increase significantly as MTC and other transportation agencies move to 511. At the same time, however, we plan to continue to work collaboratively with carriers and others to provide as wide a variety of accurate, reliable traveler information services as possible.

MTC strongly believes that providing a single, easy to remember 3-digit number will provide a valuable service to the public and provide universal accessibility to important traveler information. We respectfully urge the FCC to let stand their order establishing 511 for traveler information.

Sincerely,



Steve Heminger  
Executive Director

<sup>1</sup> Yim, Y.B. and Koo, Ronald, "TravInfo—Evaluation Traveler Response Element: TravInfo—817-1717 Caller Study Phase 2 Results," June 2000.

<sup>2</sup> Ibid